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January 27, 2022

Via ECF

Hon. Vernon S. Broderick Thurgood Marshall United States Courthouse New York, NY 10007

Re: 21-cv-8014 (VSB)

APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 01/28/2022

Plaintiff is directed to seek default judgment on or before February 28, 2022 or risk dismissal pursuant to Rule 41(b).

Dear Judge Broderick:

This office represents Plaintiffs in the above captioned matter. I am requesting a 30-day extension to submit a default judgment with respect to Your Honor's individual rules. Plaintiffs' default judgment is currently due on January 28, 2022. I apologize for failing to follow the Court's individual rules with respect to extension requests.

We have begun work on the default judgment (the affidavits for our clients' review have been drafted and needs to be translated into Spanish). But I acknowledge that I have not been as attentive to the case as I should have been. It is a combination of workload and personal matters (I moved this month). Nonetheless, I am at fault. I apologize and I ask that the Court not penalize my clients for my shortcomings. If the extension is granted, I promise to ensure that the default judgment papers are timely filed.

On behalf of my clients, I thank the court for its consideration.

Respectfully,

/s Jacob Aronauer
Jacob Aronauer

Via ECF

All attorneys on record